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Admitted Pro Hac Vice

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and Personal Representative of THE ESTATE OF RYAN GEORGE; VALERIE GEORGE and TAJMAH BEAUCHAMP, as Legal Representatives for Jaida George and Ryan George, Jr.; VALERIE GEORGE, Individually; DONALD GEORGE; and TAJMAH BEAUCHAMP, Individually,

Plaintiffs,

v.

SONOMA COUNTY SHERIFF'S DEPARTMENT; BILL COGBILL; COUNTY OF SONOMA; CALIFORNIA FORENSIC MEDICAL GROUP, INC; JAMES LUDERS, M.D.; MICHAEL E. DAGEY, R.N.; SUTTER HEALTH; SUTTER MEDICAL CENTER OF SANTA ROSA; EDWARD W. HARD, M.D.; RICHARD FLINDERS, M.D.; JOSEPH N. MATEL, M.D.; NORICK JANIAN, M.D.; and DOES 1 through 25, inclusive,

Defendants.

Case No. 3:08-cv-02675-EDL

ECF Case

STIPULATION AND [PROPOSED] ORDER RE DEFENDANT EDWARD W. HARD, M.D.'S RESPONSIVE PLEADING TO PLAINTIFFS' FIRST AMENDED COMPLAINT

Honorable Elizabeth D. Laporte

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for all parties, that subject to the Court's approval, the date for Defendant Edward W. Hard, M.D. to respond to Plaintiffs' First Amended Complaint shall be as follows:

1. The responsive pleading of Defendant Edward W. Hard, M.D. to Plaintiffs' First Amended Complaint is due January 6, 2009.

SO STIPULATED.

DATED: December 11, 2008

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: <u>/S/</u>
Carol Sleeth
One Sansome St., Suite 1400
San Francisco, CA 94104
Attorney for Defendant Edward W.
Hard, M.D.

DATED: December 11, 2008

SANFORD WITTELS & HEISLER, LLP

By: /S/
Steven L. Wittels
950 Third Avenue, 10th Floor
New York, NY 10022
Admitted Pro Hac Vice

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Facsimile: (415) 421-4784
Attorneys for Plaintiffs

December 12, 2008

SO ORDERED:

IT IS SO ORDERED

Judge Elizabeth D. Laporte

Judge Elizabeth D. Laporte

Judge Elizabeth D. Laporte

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ONE SANSOME STREET, SUITE 1400 SAN FRANCISCO, CALIFORNIA 94104 TELEPHONE (415) 362-2580

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1	FEDERAL COURT PROOF OF SERVICE		
2	George, et al. v. Sonoma County Sheriff's Department, et al. USDC, Northern District, Case No. 3:08-cv-02675 EDL		
3	STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO		
4	1		
5	business address is One Sansome Street, Suite 1400, San Francisco, California 94104. I am employed in the office of a member of the bar of this Court at whose direction the service was made.		
6	6 📗	· · · · · · · · · · · · · · · · · · ·	
7	On December 11, 2008, I served the following document(s): STIPULATION AND [PROPOSED] ORDER RE DEFENDANT EDWARD W. HARD, M.D.'S RESPONSIVE PLEADING TO PLAINTIFFS' FIRST AMENDED COMPLAINT		
8			
9	I served the documents on the following persons at the following addresses (including numbers and e-mail addresses, if applicable):		
10	Attorneys for Plaintiffs	Attorney for Defendants	
11	Steven Lance Wittels	Sonoma County Sheriff's Department, Bil	
* *	Sanford wittels & Heisler LLP	Cogbill & County of Sonoma	
12	950 Third Avenue, 10th Floor New York, NY 10022	Terry Scanlon Sterling Spaulding McCullough & Tansil LLP	
13	$\ T_0 \ _{L^2(0,1)} = \frac{(6.46)}{702} \frac{702}{2454}$	90 South E Street, Suite 200	
וני	For (646) 722 2048	Sonto Paga CA 05404	

(040) /23-2948 Email: swittels@nydclaw.com Thomas Marc Litton Sanford Wittels & Heisler LLP 120 Montgomery Street, Suite 1600 San Francisco, CA 94014 Tel: (415) 421-4770 Fax: (415) 421-4784 Email: tmlitton@gmail.com

Attorney for Defendants California Forensic Medical Group, Inc., Michael Dagey R.N., Elizabeth Kaiser, James Luders M.D. & Laura Rodriguez Jermone (Jerry) M. Varanini Trimble Sherinian & Varanini 2500 Venture Oaks Way, Suite 350 Sacramento, CA 95812 Tel: (916) 444-8271 Fax: Email: varanin@earthlink.net

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ENDED COMPLAINT
g persons at the following addresses (including fax
   Attorney for Defendants
    Sonoma County Sheriff's Department, Bill
    Cogbill & County of Sonoma
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1 2 3 4 5	Attorney for Defendant Joseph N. Matel, M.D. Joanna Lee Storey Hassard Bonnington LLP Two Embarcadero Center, Suite 1800 San Francisco, CA, 94111			
6				
7	The documents were served by the following means:			
8	the persons at the addresses listed above and (specify one):			
9	Placed the envelope or package for collection and mailing, following our ordinary			
10	correspondence for mailing. Under that practice, on the same day that correspondence is placed			
11	for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service, in a sealed envelope or package with the postage fully prepaid.			
12				
13	[X] (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification			
14	of that filing to the persons listed above.			
15	true and correct.			
16 17	Executed on December 11, 2008, at San Francisco, California.			
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